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UNITED STATES OF AMERICA

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JUAN THOMPSON,

INDICTMENT

Defendant.

## COUNT ONE

(Cyberstalking)

The Grand Jury charges:

From at least in or about July 2016 up to and 1. including at least in or about March 1, 2017, in the Southern District of New York and elsewhere, JUAN THOMPSON, the defendant, willfully and knowingly, and with the intent to injure, harass, and intimidate another person, did use the mail, an interactive computer and electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that placed that person in reasonable fear of death or serious bodily injury to that person, an immediate family member of that person, and the spouse and intimate partner of that person, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that



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person, and the spouse and intimate partner of that person, to wit, THOMPSON circulated false and threatening information to, about, and in the name of a woman ("Victim-1") over the Internet, which caused Victim-1 substantial emotional distress.

(Title 18, United States Code, Sections 2261A(2) and 2.)

OREPERSON

3/15/2017

JOON H. KIM

Acting United States Attorney

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Aurigned to Judge Crotel For all

Purposes

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